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October 14, 2011

**ELECTRONICALLY FILED**

The Honorable Rya W. Zobel  
United States District Court Judge  
District of Massachusetts  
John Joseph Moakley U.S. Courthouse  
1 Courthouse Way, Suite 2300  
Boston, Massachusetts 02210

Re: *Skyhook Wireless, Inc. v. Google Inc.*, Case No. 1:10-cv-11571-RWZ  
(D. Mass.)

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Dear Judge Zobel:

I write on behalf of Skyhook Wireless, Inc. ("Skyhook") to advise the Court about a dispute relative to the technology tutorial scheduled for October 21, 2011 at 9:00 a.m. We informed Google's counsel that we planned to have Ted Morgan, CEO of Skyhook and one of the co-inventors of the asserted patents, present Skyhook's technology tutorial. Mr. Morgan has an exceptional understanding of the technology, and is experienced at giving presentations about it. As such, I believe that the Court would benefit from having Mr. Morgan present Skyhook's tutorial.

Google wants to control who presents the tutorial on behalf of Skyhook, objecting to Mr. Morgan's participation by mischaracterizing it as "a key fact witness" "testify[ing] in the guise of a tutorial." There is only one reason Skyhook is planning to have Mr. Morgan present its tutorial—because he is by far the best person to explain the technology. He has done so to many groups since Skyhook was founded years ago. Skyhook is willing to stipulate that neither side's presentation shall be "testimony" used for any purpose other than educating the Court. Google's accusation of an ulterior motive is not well-taken.

Thank you for your attention.

Respectfully submitted,

/s/ Samuel K. Lu

Samuel K. Lu

cc: Counsel on CM/ECF

**Certificate of Service**

I, Samuel K. Lu, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on October 14, 2011.

*/s/ Samuel K. Lu*

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Samuel K. Lu